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July 15, 2022

**VIA ECF**

Special Master  
Hon. Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower, 18th  
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Philadelphia, PA 19103  
TIV@stevenslee.com

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Vanaskie:

I am writing in follow-up to the parties' conference with the Court on July 13, 2022, during which the parties agreed to provide the Court with a proposed order regarding the production of "core discovery." A proposed form of order agreed by plaintiffs and defendants is attached for your consideration.

Thank you for your attention to this matter.

Respectfully Submitted,



Jessica Davidson Miller

cc: All counsel of record (via ECF)